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April 17, 2018

**VIA E-MAIL TRANSMISSION
AND ECF FILING**

The Honorable Martin Glenn
United States Bankruptcy Judge
United States Bankruptcy Court
Southern District of New York
Alexander Hamilton Custom House
One Bowling Green
New York, New York 10004

**Re: In re Motors Liquidation Company, et al.
Case No. 09-50026 (MG)**

Letter Regarding Update on Related Proceedings

Dear Judge Glenn:

King & Spalding LLP is co-counsel with Kirkland & Ellis LLP for General Motors LLC (“**New GM**”) in the above-referenced matter. Pursuant to Judge Gerber’s Endorsed Order dated May 5, 2015 [ECF No. 13131], we write to update the Court regarding developments in proceedings in MDL 2543:

1. *A Memorandum Opinion and Order Regarding New GM’s Motion for Summary Judgment with Respect to Plaintiffs’ Claims for Benefit-of-the-Bargain Damages*, entered by Judge Furman on April 3, 2018 [MDL ECF No. 5310], a copy of which is attached hereto as **Exhibit “A.”** This Opinion was one of three anticipated developments identified in Plaintiffs’ March 26, 2018 update letter to the Court [ECF No. 14257].
2. A joint letter to Judge Furman dated April 15, 2018 from MDL Lead Counsel and New GM requesting an extension of certain deadlines relating to the economic loss schedule in MDL 2543 [MDL ECF No. 5385], which was granted pursuant to a text-only order entered by Judge Furman on April 16, 2018. A copy of this joint letter is attached hereto as **Exhibit “B.”** The schedule attached to the joint letter as Exhibit 1 modifies certain dates that were set forth in the *Schedule of Certain*

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MDL 2543 Events That May Impact the Late Claims Matter that was attached as Exhibit A to New GM's letter to the Court dated March 29, 2018 [ECF No. 14265].

3. Letters dated April 5, 2018, April 10, 2018 and April 16, 2018 to Judge Furman by New GM and the Plaintiffs in MDL 2543 regarding the status of bankruptcy court litigation regarding whether Non-Ignition Switch Plaintiffs can assert due process violations with respect to the Sale Order [MDL ECF Nos. 5340, 5341, 5368 and 5388]. Copies of these letters are attached hereto as **Exhibits "C"** through **"F."**
4. *MDL Order No. 148 [Amended] Regarding Next Steps for Pre-Sale Personal Injury Claims*, entered by Judge Furman on April 12, 2018 [MDL ECF No. 5373], a copy of which is attached hereto as **Exhibit "G."** Approximately 334 of the MDL Pre-Sale personal injury claims are also late claims filed against the MLC GUC Trust. MDL Order 148 will permit the parties to exchange basic factual information and test the legal sufficiency of such claims in the MDL.

If the Court has any questions or needs additional information, please let me know.

Respectfully submitted,

/s/ *Scott Davidson*

Scott Davidson

SD/hs
Encl.